

Oregon Department of Consumer and Business Services

Oregon Occupational Safety and Health Division (OR-OSHA)

1750 NW Naito Parkway Suite 112

Portland, OR 97209-2533

Phone: (503)229-5910



Citation and Notification of Penalty

To:

Steven G Hackett President
PCC Structurals Inc
9200 SE Sunnybrook Blvd Ste 240
Clackamas, OR 97015

Inspection Number: 315425470(91)
Inspection Date(s): 05/12/2011-09/22/2011
Issuance Date: 10/14/2011
Optional Rpt Num: C7335-026-11
Employer ID No: 8318834-013

Inspection Site:

5001 SE Johnson Creek Blvd
Milwaukie, OR 97222

The violation(s) described in this Citation and Notification of Penalty is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated.

In the interest of assuring a safe and healthy workplace, the Oregon Occupational Safety and Health Division (OR-OSHA) conducted an inspection at a workplace under your control. During this inspection, violations of the Oregon Safe Employment Act and occupational health and/or safety rules were found.

This citation lists the violations and a date by which they must be corrected. If you are not able to correct the violations by the correction date, you must apply for an extension of the correction date by following the instructions outlined later in this citation. Oregon laws require that under certain conditions violations of occupational safety and health rules carry a civil penalty. If penalties have been assessed on this citation, they have been computed in conformity with Oregon Administrative Rules, Chapter 437, Division 1. If you want to appeal this citation, file your request for hearing within 30 calendar days as outlined on the reverse side of this page. If you choose not to appeal this citation, it becomes a final order 30 calendar days after receiving it. You must abate the violations referred to in this Citation by the dates listed, and pay the proposed penalties.

An effective Safety and Health program not only assures the correction of cited violations, it also requires actions to prevent violations from recurring. Through continued cooperation of employers, employees and OR-OSHA, a safe and healthful workplace for all Oregon employees can be achieved.

COPY

Michael D. Wood, Administrator
Oregon OSHA

PLEASE SEE REVERSE SIDE OF PAGE FOR IMPORTANT INFORMATION

Posting - The law requires that a copy of this Citation and Notification of Penalty be posted immediately in a prominent place at or near the location of the violation(s) cited herein, or, if it is not practicable because of the nature of the employer's operations, where it will be readily observable by all affected employees. This Citation must remain posted until the violation(s) cited has (have) been abated, or for 3 working days (excluding weekends and holidays), whichever is longer.

Penalty PAYMENT - Penalties are due 20 days after the citation becomes final order (which is 30 days after receipt of this citation, unless appealed). Make your check or money order payable to "Department of Consumer & Business Services" (DCBS), and mail to **DCBS, Fiscal Services Section, PO Box 14610, Salem OR 97309-0445**. Please include the Inspection Number on the remittance and return a copy of the invoice with payment. OR-OSHA does not agree to any restrictions or conditions or endorsements put on any check or money order for less than the full amount due, and will cash the check or money order as if they do not exist.

Employer APPEAL Rights - If you wish to appeal a citation, you must clearly state in writing that you are requesting a hearing on the citation and specify the alleged violation(s) contested and the grounds upon which you consider the citation, proposed penalty(ies), or correction period to be unlawful. The letter requesting the appeal must be filed within 30 calendar days of receipt of the citation. An appeal letter is considered filed on the date of postmark if mailed, or on the date of receipt if transmitted by other means. If mailed, the appeal letter should be sent to: **Oregon OSHA, PO BOX 14480, Salem OR 97309-0405**.

A request for an informal conference alone is not an appeal of a citation, and any unresolved issues discussed at an informal conference will not be forwarded for appeal unless there is a timely request for hearing filed.

If you do not request a hearing within the required time frame, this citation will become a final order that is not subject to review by any agency or court.

IMPORTANT NOTE: Appealing a serious violation or the reasonableness of the correction date does not automatically extend the correction date. You may apply for an extension of the correction date through OR-OSHA or request an expedited hearing on the issue of the correction date with the Workers' Compensation Board Hearings Division (Oregon Revised Statute 654.078(6)).

Letter of Corrective Action - You are required to complete and mail the enclosed Letter of Corrective Action to the appropriate field office on or before the latest correction date on the citation. Please provide a detailed explanation and supporting documentation (if necessary), such as drawings or photographs of corrected violations, purchase or work orders, air sampling results, etc.

EXTENSION of Correction Date - You may apply for an extension of the date for correcting a violation. The request must be sent in writing to the **field office** listed on the "Letter of Corrective Action", and must include:

- (1) Employer name and address.
- (2) The location of the place of employment.
- (3) The inspection number and optional report number.
- (4) The violation number for which the extension is sought.
- (5) The reason for the request.
- (6) All available interim steps being taken to safeguard employees against the cited hazard during the requested extended correction period.
- (7) The date by which you propose to complete the correction.
- (8) A statement that a copy of the request for extension has been posted as required by OAR 437-001-0275(2)(d) and (j) or for at least 10 days, whichever is longer; and, if appropriate, provided to the authorized representative of affected employees; and, certification of the date upon which the posting or service was made.

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Your request must be postmarked or received by the Department no later than the correction date of the violation for which the extension is sought.

Employer Discrimination Unlawful - The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he/she has been discriminated against may file a complaint with the Bureau of Labor & Industries (BOLI) no later than 90 days after the discrimination occurred.

Notice to Employees - The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date is unreasonable. The objection letter must be mailed to OR-OSHA and postmarked within 30 calendar days of the receipt by the employer of this Citation and Notification of Penalty.

Adopting Federal Rules by Reference - Whenever federal rules have been adopted by reference, the federal rule number has been noted in the citation. If information is needed regarding the Oregon standard, contact the OR-OSHA field office addressed at the top of the first page of this citation.

Posting on the Internet - Federal OSHA publishes information on all inspections and citation activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to your inspection will be available not sooner than 30 calendar days after the Citation Issuance Date. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.

If you would like to discuss this citation, call the OR-OSHA office in your area:

Portland (503) 229-5910
Eugene (541) 686-7562

Salem (503) 378-3274
Bend (541) 388-6066

Medford (541) 776-6030

COPY

Oregon OSHA

Oregon Department of Consumer & Business Services

Inspection Number: 315425470**Inspection Dates:** 05/12/2011 - 09/22/2011**Issuance Date:** 10/14/2011**Citation and Notification of Penalty****Optional Rpt Num:** C7335-026-11**Company Name:** PCC Structural Inc**Inspection Site:** 5001 SE Johnson Creek Blvd, Milwaukie, OR 97222**Citation 1 Item 1 Type of Violation: Serious**

29 CFR 1910.120(q)(3)(iv): Positive-pressure self-contained breathing apparatus was not worn by employees engaged in emergency response and exposed to hazardous substances presenting an inhalation hazard or potential inhalation hazard, until such time that the individual in charge of the ICS determined through the use of air monitoring that a decreased level of respiratory protection would not result in hazardous exposures to employees:

a) The two electricians were sent to the mezzanine area of the chemical mill (hot zone), in an unknown atmosphere, without any respiratory protection.

Date By Which Violation Must be Abated:	11/14/2011
Proposed Penalty:	\$ 300.00

Citation 1 Item 2 Type of Violation: Serious

29 CFR 1910.120(q)(6): The employer did not provide appropriate training including 29 CFR 1910.120(q)(6)(i)(A) through 29 CFR 1910.120(q)(6)(i)(F):

a) The two electricians, who were not Hazwoper trained, went into the mezzanine level of the chemical mill (hot zone) to switch the power feed.

b) The millwright, who was sent into the chemical mill (hot zone) with the fire department, was not Hazwoper trained.

Date By Which Violation Must be Abated:	11/14/2011
Proposed Penalty:	\$ 300.00

TOTAL PROPOSED PENALTIES	\$ 600.00
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See pages 1 through 3 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

OR-OSHA INSPECTION SUPPLEMENT

- (1) IMIS no.: 315425470 (2) Opt rpt no.: C7335-026-11 (3) Emp. no.: 83/8834-000
- (4) Date: _____ Time in: _____ Time out: _____ Travel time: _____
- (5) Total inspection time: _____
- (6) Legal name: PCC Structural, Inc Large Parts Campus - Titanium (LPC-T)
- (7) DBA: _____
- (8) Telephone: (503) 788-6515 Telephone (cell/fax): _____
- (9) Site address: 5001 SE Johnson Creek Blvd, Milwaukie OR 97206
- (10) Mailing address: 4600 SE Harney Dr. Portland OR 97206
- (11) Legal entity: ☒ Corporation ☐ Partnership ☐ Sole owner (12) Scope: ☐ Comprehensive ☒ Partial
- (13) Insp. type: a. ☐ Accident b. ☐ Complaint c. ☐ Referral f. ☐ Follow-up g. ☐ Unprog-related h. ☐ Planned i. ☐ Prog-related
- (14) Employed in establishment: 481 Covered by inspection: 481 Employed in Oregon: 1600 (15) Union: Y ☒ (N)
- (16) OSHA 300 Log: 2009 (Year) OSHA 300

(M)											
(G)	(H)	(I)	(J)	(K)	(L)	(1)	(2)	(3)	(4)	(5)	(6)
0	25	3	9	626	856	33	0	0	0	0	3

- (17) Column H&I = 28 X 200,000 = 5,600,000 Hours Worked 851,704.48 DART rate 6.58
- (18) Type of operation Mfg. of Investment Casting (19) SIC _____ (20) NAICS 331512 Statewide average (21) DART 5.0
- (22) Management representatives
- | Name | Title | Opening | Insp | Closing |
|----------------------|------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| <u>Dave Murray</u> | <u>Mgr. of Env Affairs</u> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <u>Eileen Drake</u> | <u>VP of Admin + Legal Affairs</u> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <u>Tyson Terhaar</u> | <u>Facilities Mgr.</u> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <u>Kerry Cooley</u> | <u>Division Safety Mgr.</u> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
- (23) Employee representatives
- | Name | Title | Opening | Insp | Closing |
|-------|-------|--------------------------|--------------------------|--------------------------|
| _____ | _____ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| _____ | _____ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| _____ | _____ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
- (24) Photos taken: Digital (# rolls) Developed: Y N Video: Y N Audio _____ (# of tapes)
- (25) Workers' comp. insurance carrier: _____ Number: _____
- (26) Standards furnished: None
- (27) Does employer lease any employees? Y N Leasing co. name: _____
- (28) Citation copies: _____

10/04/11 RCVD OROSHA

SIGNATURE OF COMPLIANCE OFFICER: Chris S. Seltzer DATE: 5/16/11

Department of Consumer and Business Services
Oregon Occupational Safety and Health Division



Investigation Summary

Mon Aug 15, 2011 9:31am

Reporting ID	Investigation Summary Number	OSHA-36 Number	OSHA-36 Establishment Name
1054191	202613774		
Event Date	05/12/11	Event Time	04:20 pm
Type of Event	Power loss to ventilation system created a hazardous atmosph		

Inspection Number/ Establishment Name	315425470 PCC Structural Inc
Injured/Deceased Name	No Injury
Sex:	
Age:	
Injury:	
Nature:	
Part of Body:	
Source of Injury:	
Event Type:	
Environmental Factor:	
Human Factor:	
Task:	
Substance Code:	
Occupational Code	

Abstract:

A worker was dipping a titanium alloy part when the three phase power to the plant was losing one of the phases. The lights started to flicker and worker tried to remove the part. The crane stopped working. The air knives and ventilation system stopped working. Two electricians were sent in to try to switch the power over to the other substation feed but the overload relay was burned out and they were not able to switch the power over so the electrician left the site.

Department of Consumer and Business Services
Oregon Occupational Safety and Health Division



Worksheet

Fri Sep 30, 2011 3:44pm

				Inspection Number	315425470
				Opt. Insp. Number	026-11
Establishment Name	PCC Structurals Inc				
Type of Violation	S Serious	Citation Number	01	Item/Group	001
Number Exposed	1	No. Instances	1	REC	
Std. Alleged Vio.	1910.0120(q)(3)(iv)				

Abatement Period	MultiStep Abatements			Final Abatement	Action Type/Dates
	PPE Period	Plan	Report		
28					
Abatement Documentation Required				Date Verified	

Substance Codes	
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AVD/Variable Information:

29 CFR 1910.120(q)(3)(iv): Positive-pressure self-contained breathing apparatus was not worn by employees engaged in emergency response and exposed to hazardous substances presenting an inhalation hazard or potential inhalation hazard, until such time that the individual in charge of the ICS determined through the use of air monitoring that a decreased level of respiratory protection would not result in hazardous exposures to employees:

a) The two electricians were sent to the mezzanine area of the chemical mill(hot zone), in an unknown atmosphere without any respiratory protection.

Penalty Calculations				Adjustment Factors			Proposed Adjusted Penalty
Severity	Probability	Gravity	GBP	Size	Good Faith	History	
5	5		0.00	0	0	0	300.00
Repeat Factor		0					

Employee Exposure:

Instance Description:	A. Hazard	B. Equipment	C. Location	D. Injury/Illness	E. Measurements
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Event Date	Event Code	Action Code	Citation Type	Penalty	Abate Date	Final Code
	Z Add transaction	A Add	S Serious	300.00		

Department of Consumer and Business Services
Oregon Occupational Safety and Health Division



Worksheet

Fri Sep 30, 2011 3:44pm

Inspection Number		315425470	
Opt. Insp. Number		026-11	
Establishment Name	PCC Structural Inc		
Type of Violation	S Serious	Citation Number	01
Number Exposed	2	No. Instances	1
Std. Alleged Vio.	1910.0120(q)(6)		
Item/Group	002		
REC			

Abatement Period	MultiStep Abatements			Final Abatement	Action Type/Dates
	PPE Period	Plan	Report		
28					
Abatement Documentation Required			Date Verified		

Substance Codes	
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AVD/Variable Information:

29 CFR 1910.120(q)(6): The employer did not provide appropriate training including 29 CFR 1910.120(q)(6)(i)(A) through 29 CFR 1910.120(q)(6)(i)(F):

1) The two electricians, who were not hazwoper trained, went into the mezzanine level of the chemical mill(hot zone) to switch the power feed.

2) The millwright, who was sent into the chemical mill(hot zone) with the fire department, was not hazwoper trained.

Penalty Calculations				Adjustment Factors			Proposed Adjusted Penalty
Severity	Probability	Gravity	GBP	Size	Good Faith	History	
S	L		0.00	0	0	0	300.00
Repeat Factor		0					

Employee Exposure:

Instance Description:	A. Hazard	B. Equipment	C. Location	D. Injury/Illness	E. Measurements
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Event Date	Event Code	Action Code	Citation Type	Penalty	Abate Date	Final Order
	Z Add transaction	A Add	S Serious	300.00		



Oregon

John A. Kitzhaber, MD, Governor

Department of Consumer and Business Services
Oregon Occupational Safety & Health Division (OR-OSHA)

PCC Structurals Inc
4600 SE Harney Dr
Portland OR 97206


Inspection Number: 315425470
Optional Report Number: C7335-026-11
Employer Number: 8318834-000
Inspection Date: 05/12/2011

The Oregon Occupational Safety and Health Division (OR-OSHA) conducted an inspection of your workplace located at 5001 SE Johnson Cr Blvd, Milwaukie, Oregon. The inspection was to determine if safety or health hazards were present which could cause injury or illness to your employees. Violations of safety and/or health rules were found during this inspection and the citation is enclosed.

In addition, the OR-OSHA representative noted certain conditions that are listed on the following page, which could cause injuries and/or illnesses. Although it is not mandatory to correct them at this time, if the work process, operation, exposure, etc., changes, these conditions could be cited as violations during future inspections. By initiating corrective measures, you could reduce the high cost and human suffering associated with work-related injuries and illnesses.

There may be other hazards present which were not apparent at the time of the inspection. If you need assistance in identifying and/or eliminating health or safety hazards consultative and training services are available to you at no cost through OR-OSHA by calling (503) 378-3272.

Your continuing effort to identify and eliminate work-related hazards is appreciated.


Penny Wolf-McCormick
Health Enforcement Manager
OR-OSHA Portland Field Office
1750 NW Naito Parkway Suite 112
Portland OR 97209-2533
(503) 229-5910

315425470-plc



NOTICE

Employer Name: PCC Structural Inc
Employer Number: 8318834-000
Inspection Number: 315425470
Optional Report Number: C7335-026-11

THE FOLLOWING IS A LIST OF CONDITIONS WHICH COULD CAUSE WORK-RELATED INJURIES OR ILLNESSES TO EMPLOYEES. ALTHOUGH NOT MANDATORY AT THIS TIME THE OREGON OCCUPATIONAL SAFETY AND HEALTH DIVISION ENCOURAGES YOU TO INITIATE CORRECTIVE MEASURES FOR THESE PROBLEM AREAS IN THE INTEREST OF REDUCING THE HIGH COST AND HUMAN SUFFERING ASSOCIATED WITH WORK-RELATED INJURIES AND ILLNESSES.

Item 1-02

Rule: CFR 1910.0120(q) (1)

During an emergency response at your facility, the Clackamas County Fire Department stated that they observed a worker who entered the warm zone to go to the "smoke shack." The zones were not clearly taped off to effectively warn employees not to enter the potentially hazardous area. In the event of another emergency it is important to follow your emergency response plan, mark off the potentially hazardous areas and ensure that all employees are aware of the hot zone areas so employees will not be exposed to hazardous substances.

The issue of an employee entering the warm zone was not cited as OR-OSHA was unable to confirm the hazard. In future events, this issue could be cited and subsequent penalties imposed.

If you have any other questions regarding this or other health issues, you can contact OR-OSHA Consultative Services at (503) 229-6193.

Rule: CFR 1910.0120(q) (1)

During an emergency response at your facility, the Clackamas County Fire Department stated that they observed a worker who entered the warm zone to go to the "smoke shack." The zones were not clearly taped off to effectively warn employees not to enter the potentially hazardous area. In the event of another emergency it is important to follow your emergency response plan and clearly mark off the potentially hazardous areas so an employee will not be exposed to hazardous substances.

If you have any other questions regarding this or other health issues, you can contact OR-OSHA Consultative Services at (503) 229-6193.

INDEX OF VIOLATIONS SEVERITY AND PROBABILITY RATINGS

Optional Report Number C7335-026-11

[illegible]

PCC Structural Inc
Precision Cast Parts Inc
Optional report number: C7335-026-11,
Inspection Number: 315425470

Report Prepared by Chris Gillett

Inspection Summary

On May 12, 2011, Health Compliance Officers (HCO) Brian Hauck, Sandra Ragan and Chris Gillett initially arrived onsite. The police had traffic controls in place and Precision Cast Parts Inc (PCP) had the gate closed off. An officer was posted there to ensure no vehicles passed through except emergency personnel. HCO Gillett identified himself to the police officer and he allowed OR-OSHA through to address the worker protection issues. We were met by Firefighters Grant Coffee, Joe Pelletier, David Philips, Fred Charlton and the PCP Human Resources Manager.

The incident was still occurring at the time of OR-OSHA entry, we were told that the workers were not allowed to reenter the area. We waited while the company and emergency personnel addressed imminent issues, and then went to the front office to hold an abbreviated opening conference.

Time Line of the incident:

May 11, 2011

4:20 PM The power coming from Portland General Electric (PGE) to PCP was losing phases. They had single phase power coming into the plant from the South feed. The lights were flickering on and off. Possibly the result of maintenance performed on a switch two weeks earlier.

The area where the reaction was occurring was the Chemical Mill. Four dip tanks are used. Two tanks, of nitric acid and hydrofluoric acid blend are used to chemically mill the titanium parts. Two water tanks are used to stop the reaction of the acid baths. One tank is used per part. They use two acid baths to overlap production. The part is submerged in the tank, while rotating, to remove the brittle outer layer (alpha casing) in a uniform

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pattern. Some parts are milled to specific tolerances. The acid bath and the titanium alloy react, creating a mix of chemicals, the larger portion of which appears to be nitrous oxides. Nitrogen dioxide is toxicant of most concern. A scrubber ventilation system is installed above the tanks to capture the chemicals created from the reaction.

When the power to the PCP started coming in one phase, the scrubber system stopped working properly. The operator attempted to remove the 519-pound titanium alloy aircraft engine part that was being submerged in the chemical mill because of the power problems. The operator was removing the part but the crane stopped working and the part was still partially submerged. Sensors for the reaction chemicals were located by the operator in the tank area. The sensors began to alarm, and the operator evacuated the area. His supervisor tried to remove the titanium alloy part from the tank, from outside of the area (door has a window in it) with a radio controlled device for the crane. This also did not work.

NOTE: The sensors do not have a read-out outside of the Chemical Mill area, so they weren't able to observe the readings inside the area. When they were later able to enter the area, the next day, they found that the sensors were "burned out."

During the power fluctuations two PCC Structurals electrical workers were sent in to the mezzanine area, by a supervisor, to change the power feed over to the feed that comes into the plant from the North. They could not transfer the power under load so they had to switch some systems off. The power was switched over and they left the area. Further, it appears that an overload relay in the system was burned out by the fluctuations in power coming into the plant, so they were unsuccessful in switching the power to the North feed.

The electrical workers were in the area only 3 to 5 minutes. The mezzanine area is above the chemical mill and has a floor and surrounding walls. The electrical workers went in without respiratory protection. The electricians were fit-tested and medically evaluated to wear respirators.

The scrubber system's overload relay was tripped by the single phase power. The overload relay was damaged. They also had a diesel back up generator but, with the overload relay damaged, neither the crane nor the scrubbers could operate. Since the scrubbers were not working, the toxic gasses were released into the work area and the neighborhood.

Two of the plant managers Tyson Terhaar and Tom Harrington were on the roof of the building with the roof vent open. They realized that with the power loss that the reaction was going to continue without the scrubbers operating. At that point they decided call 911.

Approximately 5:37 PM The Fire Departments arrive. The fire department sent a firefighter in to reset the crane to lift the part out but, with the overload relay tripped it did not work. Two fire fighters and the two electricians were sent to the hospital for observation and were released. This was done as a precautionary measure.

The neighborhood was told to shelter in place for the evening. By the morning the neighbors were told it was OK to go outside. The titanium alloy part continued to react into the next day, until the submerged portion was dissolved. The fire department figures that the nitrous oxide compounds did go offsite, though not in the visible highly concentrated form.

PCC Structurals expected the backup system and/or changing the power feed to get the scrubbers and crane working. However, the switches for the power feed, and the relay, were in the area where the reaction was occurring. A firefighter was sent in to reset the system but, that did not work because the overload relay was tripped and they needed an electrician to access an electrical panel that was bolted shut.

The police had control of the back side of the building. At some point they left the site. No warning lines were put up by either the emergency personnel or the company. Late in the evening at least one PCC Structurals employee was seen in the warm zone in the smoke shack.

As the incident continued to play out, the back up systems were starting to run low. The 3000 gallon argon tank which was used as a backup to the compressed air system, was running low. The boilers for heating systems 1 and 2 needed to be restarted. If this work was not performed a significant loss of equipment and product could result. Cooling water from the city water supply would circulate and drain into the sanitary sewer system. According to the fire department an action plan was discussed and implemented with the cooperation of PCC. A Mechanic (Millwright) was sent into the hot zone to try to power up the boilers and mitigate as much damage as possible. The worker was outfitted in a tyvek suite and a Self Contained Breathing Apparatus (SCBA). The worker was not certified in

hazardous waste operations (HAZWOPER). The Fire Department did not recall any of the levels measured during the walk in to restart the boilers. They also did not know if any high levels of nitrogen dioxide were measured in the surrounding neighborhood.

This type of accident has only occurred once in fifty years. The company is looking into a change in the electrical and mechanical configuration to avoid a repeat of this situation. Sensors have now also been added to the mezzanine area.

On Monday May 16, 2011, Sandra Regan and Chris Gillett went back out to hold a formal opening conference and also address a complaint. Sandra helped Chris on the walk around for the accident and Chris helped Sandra on the walk around of the complaint. Interviews of the workers who were available were performed at that time. Chris Gillett went back on the 25th of May to interview the two electricians who went to the chemical mill to switch power from one power feed (south) to another (north). The electricians were working the swing shift. More interviews were performed on June 30, 2011. A news report came out with more information so, more interviews were performed August 18, 2011. Further interviews of the Clackamas County Fire Department Lieutenant Mike Carlson and the Millwright Sid Olsen were performed on August 23, 2011 and August 29, 2011 respectively.

As part of the inspection records were reviewed. PCC Structural's records appeared to be complete, and in compliance with OR-OSHA regulations. The employer had invited consultation out for visits. The inspection was initiated as a media referral accident inspection.

There are 1600 people employed at PCC Structural's at the present time but they have seasonal variations. The employees are not represented by a trade union. They have an emergency action plan and the workers are trained on how to react. They generally followed the emergency action plan.

The closing conference was performed on September 22, 2011. Health Enforcement Manager Chris Ottoson Accompanied Chris Gillett for the closing. Dave Murray, Eileen Drake and Doug Noble of PCC Structural's were also present.

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Conclusions:

Violations:

Low / Serious - The violation is serious but, the probability is low.

1-1 120.q(6) Training - Millwright and Electricians. The Millwright and two Electricians entered the hot zone during the event. Workers entered the hot zone to mitigate the release or to prevent further release/damage. None of these workers were trained in HAZWOPER.

Low / Serious - The violation is serious but, the probability is low.

1-2 120.q(3)(iv) Electricians entered the hot zone (chemical mill) in an unknown atmosphere without an SCBA.

Hazard Letter: Code Related

120.q(1) PCC did not adequately implement their emergency plan in that they did not prevent employees entering the area, though their plan said they would take steps to ensure that personnel would not enter the evacuation area. A worker was noted to be in the "smoke shack" during the evacuation. The "smoke shack" was in the evacuation area.

Recommendations:

- 1) Sensor readouts and electrical controls moved to outside of the chemical mill area. Currently there is no way to determine possible exposure levels in the chemical mill without entering the area. Further, when it's necessary to shut off or switch over electrical to mitigate a release, one must enter the chemical mill and enter a potential hazardous atmosphere.
- 2) Train personnel, such as maintenance workers, for Hazwoper incidents. PCC's current plan is a simple evacuation. However, it's likely unreasonable to assume that the fire department would have the skills and information necessary to know which valves, connections, switches, etc must be touched/adjusted/turned to stop a release, thereby requiring PCC personnel be involved in hazardous release mitigation.

NOTE: In confidential packet is F.D report, amended FD report, letter from PCC requesting report be amended.

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